



Office of the Secretary of State

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Re: Timesheet form electronic signatures

The Policy Authority, in attempting to maintain practices consistent with A.R.S. § 41-132, has developed a framework of Electronic Signing Policies for various electronic signing technologies and processes. These Electronic Signing Policies tend to be rather involved documents since they must anticipate the possible range of uses for that technology and related business processes. It is impracticable to write a comprehensive Electronic Signing Policy for PIN/Password based electronic signatures given the wide range of possible implementations. Each PIN/Password signing process must be individually reviewed and monitored. This memo discusses the PIN/Password-based signing process that the Department of Education desires to implement for internal timesheet forms processing. It is based on our current understanding of the technology and planned use.

As we understand the signing process, the core issue is to assure that the signing process complies with statutory requirements that the electronic signature:

1. is unique to the person using it,
2. is under the sole control of that person, and
3. is invalidated if there is any change to the document after the signing.

The Department of Education wishes to use a intranet web-based Timesheet form in a multi-signature timesheet approval process. A person's access to complete or approve a timesheet submittal is to be treated as his or her signature. It is our understanding that the essential reason for a signature on these forms is to provide an auditable process that establishes each person's submission or approval of the timesheet prior to the buyer completing the purchase. The letter dated September 26th, 2002 (as received September 30th) satisfies our documentation needs. Our approval of this as an electronic signing process is granted on these conditions:

1. that the process has the ongoing approval of the ADOA General Accounting Office (GAO),
2. no negative audit findings by GAO or the Auditor General regarding their ability to audit this process and thereby prove the link of the unaltered record to the person, and
3. that we and GAO are notified by the Department of Education of any material change in the process described in your letter so that we may review the changed process for re-

approval as an electronic signing process. What we mean by “material change” is described in Appendix A.

We look forward to working with the Department of Education on this effort.

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cc: Warren Whitney, Deputy Secretary of State
Greg Vokoun, Assistant State Accounting Administrator, GAO
Mike Tothorow, CIO, Arizona Secretary of State
Rick Rachkofski, ADE
Keith Boesel, ADE

Appendix A - Material Changes Affecting Approval

A material change would be 1) any audit requirement of GAO or the Auditor General affecting the signing process or 2) any significant change affecting the following issues:

1. How the Signers are authenticated as the parties they represent themselves to be and how the Signers are each uniquely linked to their “signature.”
2. How a signature is reasonably under the sole control of the Signer. Given the nature of the signing process, we need some general sense of the overall security of the information system elements. This includes the security features regarding the user and his or her access and some description of the “back-end” security that assures the integrity of:
 - a. the person’s access to the system and
 - b. the prevention of anyone else altering the stored signed record or related “signature.”
3. How record integrity is to be ascertained and how that integrity is linked to the Signer’s electronic signature so that any party with a legal interest is able to verify that integrity and link over the record retention period of the electronic document (e.g., a GAO or Auditor General audit).
4. What mechanisms will be in place to archive the transactions with the chain of authorities, how that archive may be accessed, and by what means those archives will be protected from subsequent modification.